

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ONLINE MERCHANTS GUILD,	:	CIVIL ACTION NO. 1:21-CV-369
	:	
Plaintiff	:	(Judge Conner)
	:	
v.	:	
	:	
C. DANIEL HASSELL, in his official capacity as SECRETARY OF REVENUE, DEPARTMENT OF REVENUE,	:	
	:	
Defendant	:	

ORDER

AND NOW, this 30th day of April, 2021, upon consideration of the motion (Doc. 9) for a temporary restraining order and preliminary injunction filed on March 4, 2021, and the parties' respective briefs in support of and opposition to said motion, it is hereby ORDERED that:

1. The parties shall file supplemental briefs in support of and in opposition to, respectively, the motion for a preliminary injunction no later than 5:00 p.m. on Thursday, May 6, 2021.¹

¹ As discussed at the preliminary injunction hearing, the parties are specifically directed to address (1) any analogous or distinguishable case law discussing the applicability of the Tax Injunction Act to Due Process Clause claims similar to that in this case, and (2) the adequacy of the Commonwealth's remedies regarding challenges to tax policies of the kind involved in this matter.

2. The parties shall participate in a conference regarding the Department of Revenue's voluntary compliance program deadline with a United States Magistrate Judge no later than **Thursday, May 6, 2021**. This matter is REFERRED to Magistrate Judge Susan E. Schwab for purposes of conducting the conference.

/S/ CHRISTOPHER C. CONNER

Christopher C. Conner
United States District Judge
Middle District of Pennsylvania